

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Bryan Kendrick SALINAS

Jesus Isais RODRIGUEZ

Jose Jaziel SILVA JR

Case No.

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 24, 2022 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet./S/Edilberto Ramirez*Complainant's signature*Edilberto Ramirez, Border Patrol Agent*Printed name and title*

Sworn to before me and signed in my presence,

Date: August 26, 2022*Judge's signature*City and state: Laredo, TexasChristopher dos Santos, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Bryan Kendrick SALINAS, Jesus Isais RODRIGUEZ, Jose  
Jaziel SILVA JR

Case Number:

On August 23, 2022, Laredo South Horse Patrol Unit Agent (LRS HPU) and Border Patrol Agents (BPA) were working their assigned duties when a Laredo Sector camera operator relayed that a group of possible undocumented non-citizens (UNCs) were seen near the McMahon Ranch in Laredo, Texas in Webb County. BPA 1 and BPA 2 arrived at McMahon Ranch and noticed foot sign leading towards the intersection of Mangana-Hein Road. BPA 1 continued to follow the foot sign near Mangana-Hein Road when he saw a white Chrysler 300 and a light in color Ford Fusion traveling east at a high rate of speed. BPA 1 relayed the description of the vehicles to an air asset to assist them. BPA 1 kept visual of both vehicles and saw both vehicles abruptly stop near a culvert, honk their horns, and observed several subjects run from the brush and into the Ford Fusion and take off east of Mangana-Hein Road. The air asset arrived on scene and maintained visual on both vehicles.

Department of Public Safety (DPS) Trooper monitoring the radio traffic observed the vehicles in question traveling at a high rate of speed north on Cuatro Vientos Road and informed BPA they encountered the vehicles matching the description and proceeded to conduct a traffic stop on the Chrysler 300 and Ford Fusion. BPA arrived on scene and conducted an immigration inspection on all passengers resulting in three United States citizens (USC) and four UNCs. DPS Trooper issued Bryan Kendrick SALINAS, driver of the Ford Fusion, a citation for 'No driver license when unlicensed-not CDL' and 'speeding over the limit'. DPS trooper issued Jesus Isais RODRIGUEZ, driver of the Chrysler 300, a citation for 'speeding 87 in a 55 MPH zone' and 'No driver license when unlicensed-not CDL'. At that time, BPAs took custody of all subjects and transported them to a Border Patrol Station for further processing.

PRINCIPAL STATEMENT: Bryan Kendrick SALINAS, a United States citizen, was provided his Miranda Rights and acknowledged he understood them by signing service form I-214. SALINAS stated he would be willing to give a statement without an attorney present. SALINAS stated he picked up four illegal subjects on Mangana-Hein Road on August 24, 2022. SALINAS stated RODRIGUEZ hired him to pick up the subjects. Salinas stated he was working with the driver, RODRIGUEZ, and the passenger, Jose Jaziel SILVA, in the Chrysler 300. SALINAS stated he worked with RODRIGUEZ in a previous job but did not get paid but was promised by RODRIGUEZ that he would be getting paid for this smuggling attempt and the previous job. SALINAS stated RODRIGUEZ called him and told him to follow him. SALINAS stated he, RODRIGUEZ, and SILVA met at a gas station on Cielito Lindo Road and U.S. Highway 83. SALINAS stated he kept in contact with RODRIGUEZ throughout the smuggling attempt via cell phone. SALINAS stated they broke contact when the illegal aliens were in the Ford Fusion. SALINAS was presented with two six-person photo lineups and was able to positively identify RODRIGUEZ and SILVA.

PRINCIPAL STATEMENT: Jesus Isais RODRIGUEZ, a United States citizen, was provided his Miranda Rights and acknowledged he understood them by signing service form I-214. RODRIGUEZ stated he would be willing to give a statement without an attorney present. RODRIGUEZ stated he was at a gas station on Cielito Lindo Road and U.S Highway 83 with his friend SILVA when they decided to go for a drive south on U.S. Highway 83 towards Mangana-Hein Road. RODRIGUEZ stated they then drove north on Cuatro Vientos Road and were pulled over by DPS troopers. RODRIGUEZ stated he was unaware of anyone attempting to pickup subjects.

PRINCIPAL STATEMENT: Jose Jaziel Silva Jr., a United States citizen, was provided his Miranda Rights and acknowledged he understood them by signing service form I-214. SILVA stated he would be willing to give a statement without an attorney present. SILVA stated he was with his friend, RODRIGUEZ. SILVA stated later in the evening they went to a gas station on Cielito Lindo Road and U.S. Highway 83 where he met SALINAS who was driving a grey Ford Fusion. SILVA stated while at the gas station, SALINAS and RODRIGUEZ coordinated the pickup of subjects near U.S. Highway 83 and Mangana-Hein Road. SILVA admitted knowledge of what they were going to be doing and got into the passenger seat of the Chrysler 300 that was driven by

RODRIGUEZ. SILVA stated they planned on the subjects getting into SALINAS' Ford Fusion. SILVA stated he informed RODRIGUEZ that he did not want to be involved but since RODRIGUEZ was committed, SILVA decided to go. SILVA stated while driving U.S. Highway 83, RODRIGUEZ and SALINAS remained on the phone until they came to an abrupt stop and SILVA saw multiple subjects run from the brush into the SALINAS' vehicle. SILVA stated they drove for approximately ten minutes until they were pulled over by DPS Troopers. SILVA stated he believed they were being pulled over for speeding since they did not have subjects in the vehicle.

MATERIAL WITNESS STATEMENT: Abraham RIVERA-OLVERA is a Mexican national and is serving as a material witness in the alien smuggling case against RODRIGUEZ, SALINAS and SILVA. RIVERA-Olvera stated he illegally entered the United States along with five individuals. RIVERA-OLVERA stated a family member made the arrangements to be smuggled for \$2,500.00 dollars. RIVERA-Olvera stated an individual was guiding them with a map on their phone. RIVERA-Olvera stated the individual gave them directions to get into a grey car after it honked. RIVERA -Olvera stated once he was near the road, they attempted to get into a car but went back into the brush since the car did not honk. RIVERA-Olvera stated a minute later, a light in color four-door sedan drove by, honked, and they ran to the vehicle. RIVERA-Olvera was able to identify the vehicle as a Ford Fusion. RIVERA-Olvera stated once in the vehicle, they were instructed to put their heads down. RIVERA-Olvera stated he sat in the rear seat behind the driver. RIVERA-Olvera was presented with a six-person photo lineup and was unable to positively identify the driver.

MATERIAL WITNESS STATEMENT: Manuel Adonias GUARCHAJ-Cumatz is a Guatemalan national and is serving as a material witness in the alien smuggling case against RODRIGUEZ, SALINAS and SILVA. GUARCHAJ-Cumatz stated he illegally crossed into the United States with several other subjects. GUARCHAJ stated he made the arrangement to be smuggled for \$80,000.00 Quetzales in Guatemala. GUARCHAJ-Cumatz stated a cell phone global positioning system (GPS) guided them through a ranch. GUARCHAJ-Cumatz stated once they reached the highway, they waited in the brush for a gray in color vehicle to pick them up. GUARCHAJ-Cumatz stated once the vehicle arrived, he got in the front passenger seat and tucked his head down as instructed by the driver. GUARCHAJ-Cumatz stated approximately ten minutes after taking off, they were pulled over by police and then later Border Patrol arrived. GUARCHAJ-Cumatz was presented with a six-person photo lineup and was unable to positively identify the driver.

SUBSCRIBED and SWORN to before me on

26th day of August, 2022

\_\_\_\_\_  
Signature of Judicial Officer

/S/ Ramirez, Edilberto Border Patrol Agent  
\_\_\_\_\_  
Signature of Complainant